

IN THE MATTER OF
PEARL CULLER BAILEY,
JAMES THEODORE BAILEY AND
PHILLIP ROGER BAILEY
ON
P E T I T I O N

* NO. 18,779 EQUITY
*
* IN THE CIRCUIT COURT FOR
*
* FREDERICK COUNTY, MARYLAND
*

* * * * *

MOTION TO SELL REAL ESTATE

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Petition of Robert Pendleton Bailey, Jr., Lulu Bailey Sween and Ralph L. Gastley, Jr., Substitute Trustees by Franklin D. Stillrich, their solicitors, respectfully represents unto your Honorable Court.

FIRST: That your Petitioners were appointed Substitute Trustees by Order of this Honorable Court on September 16, 1982, whereby said Decree set forth that they would not sell or convey assets of the estate without prior Order of this Court.

SECOND: That on March 28, 1987 said Substitute Trustee entered into a Contract of Sale to sell certain property located at Route 180, Jefferson Pike, Frederick County, Maryland, containing approximately 6.5 acres of land, more or less, with a purchase price of Thirty Thousand Dollars (\$30,000.00) a copy of said contract of sale is attached hereto and prayed to be made a part hereof.

THIRD: That said property was appraised on March 20, 1983 and is shown as Parcel 3, for Thirty Six Thousand Dollars (\$36,000.00) a copy of said appraisal is attached hereto and prayed to be made a part hereof.

FOURTH: That said property is unimproved and has not been perked and it is felt by said Substitute Trustees that said price is the best and highest price obtainable for said property which the Substitute Trustees have